

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**CONSERVATION LAW  
FOUNDATION, INC.,**

**Plaintiff,**

**v.**

**MITT ROMNEY, in his official  
capacity as GOVERNOR OF  
MASSACHUSETTS, et al.,**

**Defendants.**

**C.A. No. 05-10487-NG**

**ASSENTED-TO MOTION TO FURTHER ENLARGE TIME  
TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

The State Defendants,<sup>1</sup> and on behalf of the MBTA Defendants,<sup>2</sup> respectfully move for a brief further enlargement of time, up to and including April 17, 2006, to serve an answer to Counts One, Two, Four through Twelve, and Nineteen of Plaintiff's Complaint. A response is currently due on April 10, 2006. In support of this motion, the State Defendants state that their lead counsel's 92-year old mother was hospitalized this morning, and that he anticipates being out of work for a significant number of days as a result. Plaintiff has assented to the requested enlargement of time.

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<sup>1</sup> The State Defendants are the following state officials, sued in their official capacities: the Governor of Massachusetts; the Secretary of the Office for Commonwealth Development; the Chairman of the Commonwealth Development Coordinating Council; the Secretary of the Executive Office of Transportation; the Commissioner of the Massachusetts Highway Department; and the Commissioner of the Department of Environmental Protection.

<sup>2</sup> The MBTA Defendants are the Massachusetts Bay Transportation Authority and Michael H. Mulhern, in his official capacity as General Manager of the MBTA.

For the foregoing reasons, the State Defendants respectfully request that the Court further enlarge their time (and the time of the MBTA Defendants) for serving an answer to Counts One, Two, Four through Twelve, and Nineteen of Plaintiff's Complaint to, and including, April 17, 2006.

Respectfully submitted,

THOMAS F. REILLY  
ATTORNEY GENERAL

/s/ David Hadas  
Pierce O. Cray, BBO # 104630  
David Hadas, BBO # 641294  
Assistant Attorneys General  
Government Bureau  
One Ashburton Place, Room 2019  
Boston, Massachusetts 02108  
(617) 727-2200, ext. 2619  
[pierce.cray@ago.state.ma.us](mailto:pierce.cray@ago.state.ma.us)  
[david.hadas@ago.state.ma.us](mailto:david.hadas@ago.state.ma.us)

-AND-

William L. Pardee, BBO # 389070  
Assistant Attorney General  
Environmental Protection Division  
One Ashburton Place, Room 1813  
Boston, Massachusetts 02108  
(617) 727-2200, ext. 2419  
[bill.pardee@ago.state.ma.us](mailto:bill.pardee@ago.state.ma.us)

**Date: April 10, 2006**

LOCAL RULE 7.1(A)(2) CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), I certify that I have conferred with counsel for the plaintiff and that she has assented to the requested enlargement of time.

/s/ David Hadas  
David Hadas